

From: [Richard D. Kramer](#)
To: [Russell Wasem](#)
Subject: RE:
Date: Thursday, May 02, 2013 5:05:10 PM

Rusty,

Thank you for your timely response - it is greatly appreciated and addresses my concern in moving ahead with this product.

--

Richard D. Kramer, Ph.D.
Board Certified Entomologist
President
o 240-755-0077
c 301-821-0323
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On Thu, 2 May 2013 20:41:37 +0000, Russell Wasem
<Wasem.Russell@epa.gov> wrote:

Hello Richard,

>

> We only regulate the bait box if it were sold with the rodenticide.
> If the bait box is sold separately, we do not regulate it. Our review
> of bait station rodenticide products is also geared towards
> residential consumer products and the bait station you describe seems
> to be geared more towards the occupational user of rodenticides. So
> unless the plan is to market a single combo dumpster bait station and
> rodenticide product, it isn't necessary to demonstrate to EPA that
> the bait box is tamper resistant. If you are interested, we have
> developed protocols designed to demonstrate a bait station's ability
> to protect bait from children and dogs. This protocol can be found in
> the appendices of our Risk Mitigation Decision for Ten Rodenticides
> (<http://www.regulations.gov/#!documentDetail:D=EPA-HQ-OPP-2006-0955-0764>).
> Please let me know if you have any further questions.

>

> Regards,

>

> Rusty Rusty Wasem / Chemical Review Manager
> Risk Management & Implementation Branch 1*
> Pesticide Re-evaluation Division* / Office of Pesticide Programs
> 703 / 305 6979

>

> -----Original Message-----

> From: Richard D. Kramer [<mailto:rkramer@ipm4u.com>] Sent: Thursday,
> May 02, 2013 4:16 PM
> To: Russell Wasem
> Cc: Joshua A. Kramer
> Subject: Mr. Wasem,

>

> Nancy fitz suggested I contact you regarding my question below. If
> this is not within your purview I would appreciate you directing me to
> the right person.
> I have a manufacturer who has developed a bait box to be installed
> inside dumpster with an exterior portal. Who do we contact at EPA to
> get this sanctioned as a tamper resistant station (it's made of 18
> gauge steel) or is that even necessary?

>

> Thank you!
> --
> Richard D. Kramer, Ph.D. Board Certified Entomologist
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